

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)
) CASE NO. 20 B 11230
Anthony Crocilla and Melissa Crocilla,) HON. Janet S. Baer
)
DEBTORS.) CHAPTER 13

NOTICE OF MOTION

TO: Glenn B Stearns, 801 Warrenville Road, Suite 650, Lisle, IL 60532;

See Attached Service List

PLEASE TAKE NOTICE that on July 9, 2021, at 9:30 A.M., I will appear before the HONORABLE Janet S. Baer or before any judge sitting in that judge's place, and present the attached Motion to Modify Plan, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828- 7666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is 160 731 2971 and the password is 587656. The meeting ID and password can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that he transmitted a copy of this notice and the attached motion to the above-named creditor and also to the attached service list via regular U.S. Mail with postage prepaid from the mailbox located at 20 S. Clark Street, Chicago, IL 60603 on June 8, 2021.

/s/ Yisroel Moskovits

Attorney for Debtor

The Semrad Law Firm, LLC
20 S. Clark Street, 28th Floor
Chicago, IL 60603
312-913-0625

Label Matrix for local noticing
0752-1

Case 20-11230
Northern District of Illinois
Eastern Division
Tue Jun 8 13:53:32 CDT 2021

ARRONRNTS
309 E PACES FERRY
ATLANTA, GA 30305-2377

CB/VICSCRT
220 W SCHROCK RD
WESTERVILLE, OH 43081-2873

Capital One, N.A.
c/o Becket and Lee LLP
PO Box 3001
Malvern PA 19355-0701

FIRST MERIT BANK
295 FIRST MERIT CIRCLE
AKRON, OH 44307-2305

HNTINGTN NTL
7450 HUNTINGTON PA
COLUMBUS, OH 43235-5617

(p)ILLINOIS DEPARTMENT OF REVENUE
BANKRUPTCY UNIT
PO BOX 19035
SPRINGFIELD IL 62794-9035

Internal Revenue Service
P.O. Box 7346
Philadelphia Pennsylvania 19101-7346

Midland Credit Management, Inc.
PO Box 2037
Warren, MI 48090-2037

TIDEWATER CREDIT SERVI
6520 INDIAN RIVER RD
VIRGINIA BEACH, VA 23464-3439

U.S. Bankruptcy Court
Eastern Division
219 S Dearborn
7th Floor
Chicago, IL 60604-1702

Bank of America
PO Box 790087
Saint Louis, MO 63179-0087

CITIZENS FIN
1477 LOCUST ST
DUBUQUE, IA 52001-4715

City of Chicago Department of Finance
c/o Arnold Scott Harris P.C.
111 W Jackson Blvd Ste 600
Chicago, IL 60604-3517

FORD MOTOR CREDIT COMP
PO BOX BOX 542000
OMAHA, NE 68154-8000

(p)INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY OPERATIONS
PO BOX 7346
PHILADELPHIA PA 19101-7346

Illinois Department of Employment Security
PO Box 4385
Chicago, IL 60680-4385

KOHLs/CAPONE
N56 RIDGEWOOD DR
MENOMONEE FAL, WI 53051

Opp Loans
11 E. Adams St. #501
Chicago, IL 60603-6333

The Huntington National Bank
P O Box 89424
Cleveland OH 44101-6424

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ACCEPTANCE NOW
6288 Dawson Blvd
Norcross, GA 30093-1201

Brandon S. Lefkowitz
29777 Telegraph Road, Suite 2440
Southfield, MI 48034-7667

Capital One Bank
PO Box 85617
Richmond, VA 23285-5617

Dupage County Clerk
421 N County Farm Rd
Wheaton, IL 60187-3992

(p)FORD MOTOR CREDIT COMPANY
P O BOX 62180
COLORADO SPRINGS CO 80962-2180

IRS
P.O. Box 7346
Philadelphia Pennsylvania 19101-7346

Illinois Tollway
2700 Ogden Ave
Legal Dept
Downers Grove, IL 60515-1703

Kohls/Capone
N56 W 17000 RIDGEWOOD DR
MENOMONEE FALLS Wisconsin 53051-7096

Opportunity Financial, LLC
130 E. Randolph Street
Suite 3400
Chicago, IL 60601-6379

The Illinois Tollway
PO Box 5544
Chicago, IL 60680-5491

Unifund CCR, LLC

Resurgence Legal Group, PC

3000 Lakeside Drive, Suite 309-S

Bannockburn, IL 60015-1249

Anthony Crocilla

320 North Rush Street

Itasca, IL 60143-1844

Document
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Patrick S Layng

Office of the U.S. Trustee, Region 11

219 S Dearborn St

Room 873

Chicago, IL 60604-2027

Yisroel Y Moskovits

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Chicago, IL 60603-1811

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

FORD MOTOR CREDIT COMPANY LLC

PO Box 62180

Colorado Springs, CO 80962

IRS

Irs Mail Stop 4100 P-3

Kansas City, MO 64999

Idor-Bankruptcy Section

P.O. Box 19035

C/O Bankruptcy Unit

Springfield Illinois 62794

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)FORD MOTOR CREDIT COMPANY LLC

End of Label Matrix

Mailable recipients 37

Bypassed recipients 1

Total 38

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)	
)	CASE NO. 20 B 11230
Anthony Crocilla and Melissa Crocilla,)	HON. Janet S. Baer
DEBTORS)	CHAPTER 13

MOTION TO MODIFY PLAN

NOW COMES, Anthony Crocilla and Melissa Crocilla, Debtors, by and through Debtors' attorney, The Semrad Law Firm, LLC, moves this Honorable Court to enter an Order Modifying Debtors' Chapter 13 Plan of Reorganization as set forth below, and in support thereof states as follows:

1. That this Court has jurisdiction over this proceeding pursuant to 28 U.S.C §§1334 & 157. This is a core proceeding pursuant to 28 U.S.C. §157.
2. Debtors filed the above captioned voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code on June 4, 2021.
3. This Honorable Court has yet confirmed the instant case on December 18, 2020.
4. That the confirmed Chapter 13 Plan requires the Debtors to make plan payments to the Chapter 13 Trustee in the amount of \$510.00 on a monthly basis for a term of 15 months and \$830.00 per month for 21 months.
5. That the Debtors' confirmed Chapter 13 Plan allows for secured creditors to be paid 100% of their allowed claims, and general unsecured creditors to be paid 10% of their allowed claims.
6. Debtors fell behind on plan payments because he took a leave of absence from work to help care for his wife, the Co-Debtor, who is dealing with a serious medical condition, and when he tried to return, they didn't have enough work for him.

7. Debtors fell behind on their necessary household expenses and further down on their Trustee payments. That as a result, Debtors accrued a plan payment delinquency.
8. Debtor is now employed elsewhere. Please see Exhibit A.
9. Debtors are able to continue making the Trustee payments, if the default is deferred.
10. Debtors respectfully request this Honorable Court to defer the current plan default to the end of the plan of reorganization.
11. Debtors are in a position to continue with their Chapter 13 Plan of reorganization.
12. That the Debtors have every good faith intention of completing the Chapter 13 Plan of reorganization.

WHEREFORE, Anthony Crocilla and Melissa Crocilla , Debtors, respectfully request this Honorable Court enter an Order Modifying the Debtor's Chapter 13 Plan:

- (a) To defer the current Chapter 13 Plan default to the end of the plan of reorganization;
- (b) For such other and further relief as this Court deems fair and just.

Respectfully Submitted,

/s/ Yisroel Moskovits
Attorney for the Debtor
The Semrad Law Firm, LLC
20 S. Clark Street, 28th Floor
Chicago, IL 60603
(312) 913-0625